ICC 20-NOI-03

MidAmerican Energy Company's Response

Regarding Rate Design and Affordability with Respect to Transportation Electrification and Other Beneficial Electrification

	Question	MidAmerican Energy Response
A. Rate Design Impacts on Electric Vehicle Adoption and Use		
1. EV Adoption and Use by Residential Customers Living in Single-Family Housing		
a.	Do current electric rate designs prevent residential customers living in single-family housing from adopting and using EVs? If so, how?	MidAmerican's current non-summer residential base electric rate has a second, lower-priced rate step at 1,000 kWh per month that provides an incentive for residential EV charging, at least during the eight non-summer months. Additionally, MidAmerican offers an optional time-of-use rate which provides the opportunity to charge at a lower cost during off-peak hours.
b.	Should electric rate designs be used to encourage residential customers living in single-family housing to adopt and use EVs? Why or why not?	Yes, electric rate designs should be used to encourage residential adoption of EVs. Rate design can be used to improve the load profiles of both the residential class and the system, through increased off-peak charging.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate residential customers living in single-family housing to adopt and use EVs?	Time-of-use rates, which are currently available, is the primary rate design tool for encouraging EV use. In addition to the currently available time-of-use rates, another option could be use of EV chargers that provide time-of-use data enabling customers on standard rates to receive bill adjustments based on the customer's on-peak/off-peak EV charging pattern.
d.	How do electric rate designs used to encourage single-family residential customers to adopt and use EVs affect the affordability of electric service for other electricity users	The impact on other users can be eliminated through proper rate design that highly encourages off-peak usage as well as through administrative charges that cover the cost of targeted programs. In addition, limitations on the availability of EV incentives for customers taking service pursuant to the provisions of 83 Ill. Adm. Code Part 465 - Net Metering, who are already being subsidized by other customers, will help limit the further impact on other customers.
2. EV Adoption and Use by Residential Customers Living in Multi-Family Housing		
a.	Do current electric rate designs prevent residential customers living in multi-family housing from adopting and using EVs? If so, how?	It depends on the specific situation. If the multi-family housing is an owner-occupied condo or townhouse with a private garage, EV adoption may be similar to that for single-family housing. In situations where the owner-occupied dwelling does not have the facilities to either plug in a Level 1 charger or install a dedicated Level 2 charger for the dwelling, EV adoption will be more difficult. Multi-family rental housing presents a greater challenge unless that renter has the ability to access a 120-volt outlet to at least use a Level 1 charger. As Level 2 chargers represent a significant investment, it is unlikely a renter would incur the cost to install one even if physically practical. Landlords who own the multi-family dwelling may choose to make the investment to provide Level 2 charging to their tenants. However, landlords would likely pass the cost of the charging facilities indirectly through the monthly rental charge, and without any control on when (i.e., off-peak vs. on-peak) and to what extent these facilities are used, the landlord may need to assume that the chargers will be used extensively during peak periods. Depending on the electric rate that the landlord pays for the building, the impact on the building's energy bill could be more significant than if use of the charger was billed directly to the tenant.
b.	Should electric rate designs be used to encourage residential customers living in multi-family housing to adopt and use EVs? Why or why not?	Any rate designs that are offered to single-family housing to encourage EV adoption should be offered to owners and tenants of multi-family housing where practical, particularly where these rate designs encourage off-peak use of energy. As electric vehicles become more affordable and therefore more common, residential customers in multi-family housing will be asking for the same incentives offered to others.

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c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate residential customers living in multi-family housing to adopt and use EVs?	Any incentive offered to encourage EV adoption should be based on time-of-use rates that ensure predominantly off-peak EV charging. These rates should cover the costs imposed on the system.
d.	How do electric rate designs used to encourage multi-family residential customers to adopt and use EVs affect the affordability of electric service for other electricity users?	The impact on other users can be eliminated through proper rate design that highly encourages off-peak usage as well as through administrative charges that cover the cost of targeted programs.
3. EV Charging by Employees at the Workplace		
a.	Do current electric rate designs prevent businesses from installing EV charging infrastructure for their employees or employees from charging EVs at their workplaces? If so, how?	Current rate designs wouldn't necessarily prevent businesses from installing EV charging infrastructure for their employees. However, to the extent that the business is subject to time-of-use rates and/or a peak demand charge, offering EV charging to its employees will be relatively more costly for businesses with normal, weekday hours.
b.	Should electric rate designs be used to encourage businesses to install charging infrastructure and for employees to charge EVs at their workplaces? Why or why not?	It is less obvious that electric rate design could incent businesses with normal weekday hours to install EV charging infrastructure without having an adverse impact on other customers. While technology is still nascent, customer and employee charging could be erratic, and could occur during peak hours. Additions to peak load through weekday, daytime electric vehicle charging will raise total system costs which may not be covered through incentive rates applied to that load.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate businesses to install charging infrastructure and for employees to charge EVs at their workplaces?	See responses above.
d.	How do electric rate designs used to incent businesses to install charging infrastructure and for employees to charge EVs at their workplaces affect the affordability of electric service for other electricity users?	As discussed above, incentive rates that are directed to on-peak loads can raise the cost of energy for all other customers. In addition, limitations on the availability of EV incentives for customers taking service pursuant to the provisions of 83 Ill. Adm. Code Part 465 - Net Metering, who are already being subsidized by other customers, will help limit the further impact on other customers.
e.	Provide examples of rate designs employed in other states or jurisdictions that successfully incentivized business to install charging infrastructure for employees and/or customers.	MidAmerican has not yet offered any rate design to incentivize installation of charging infrastructure in other jurisdictions. However, MidAmerican is studying the use of targeted time-of-use rates to support off-peak residential EV charging. In addition, MidAmerican currently offers electric vehicle rebates in its Iowa service territory.
4. EV Fleet Adoption and Use by Businesses		
a.	Do current electric rate designs prevent business customers from adopting and using EV fleets? If so, how?	To the extent that business customers have time-of-use rates, EV fleet charging can be accomplished at a relatively low cost during off-peak hours.
b.	Should electric rate designs be used to encourage business customers to adopt and use EV fleets? Why or why not?	Current rate design already accomplishes this goal. No incentive should be offered that causes a customer's load profile to deteriorate.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate business customers to adopt and use EV fleets?	Current rate design already accomplishes this goal. No incentive should be offered that causes a customer's load profile to deteriorate.

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d.	How do electric rate designs used to incent business customers to adopt and use EV fleets affect the affordability of electric service for other electricity users?	Current rate design helps ensure that subsidization of EV customers does not occur. As noted above, additional incentives may result in costs being shifted to other customers. In addition, limitations on the availability of EV incentives for customers taking service pursuant to the provisions of 83 Ill. Adm. Code Part 465 - Net Metering, who are already being subsidized by other customers, will help limit the further impact on other customers.
5. EV Charging Station Deployment by Businesses for Customer Use		
a.	Do current electric rate designs prevent businesses from deploying charging equipment for customer use? If so, how?	Current rate designs wouldn't necessarily prevent businesses from installing EV charging infrastructure for their customers. However, to the extent that the business is subject to time-of-use rates and/or a peak demand charge, offering EV charging to its customers will be relatively more costly for businesses with normal, weekday hours.
b.	Should electric rate designs be used to encourage businesses to deploy charging stations for use by their customers? Why or why not?	It is less obvious that electric rate design could incent businesses with normal weekday hours to install EV charging infrastructure without having an adverse impact on other customers. While technology is still nascent, customer and employee charging could be erratic, and could occur during peak hours. Additions to peak load through weekday, daytime electric vehicle charging will raise total system costs which may not be covered through incentive rates applied to that load.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate businesses to deploy charging stations for use by their customers?	See responses above.
d.	How do electric rate designs used to incent businesses to deploy charging stations for the use of their customers affect the affordability of electric service for other electricity users?	As discussed above, incentive rates that are directed to on-peak loads can raise the cost of energy for all other utility customers. In addition, limitations on the availability of EV incentives for customers taking service pursuant to the provisions of 83 Ill. Adm. Code Part 465 - Net Metering, who are already being subsidized by other customers, will help limit the further impact on other customers.
6. EV Charging Station Deployment by Units of Government		
a.	Do current electric rate designs prevent units of government from deploying charging equipment for public use? If so, how?	Current rate designs wouldn't necessarily prevent units of government from installing EV charging infrastructure for their employees. However, to the extent that the unit of government is subject to time-of-use rates and/or a peak demand charge, offering EV charging to its employees will be relatively more costly for units of government with normal, weekday hours.
b.	Should electric rate designs be used to encourage units of government to deploy charging equipment for public use? Why or why not?	It may be difficult to use electric rate design to incent units of government with normal weekday hours to install EV charging infrastructure without having an adverse impact on other utility customers. Additions to peak load through weekday, daytime electric vehicle charging will raise total system costs which may not be covered through incentive rates applied to that load.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate units of government to deploy charging equipment for public use?	See responses above.
d.	How do electric rate designs used to incent units of government to deploy charging equipment for public use	As discussed above, incentive rates that are directed to on-peak loads can raise the cost of energy for all other utility customers. In addition, limitations on the availability of EV incentives for customers

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	affect the affordability of electric service for other electricity users?	taking service pursuant to the provisions of 83 Ill. Adm. Code Part 465 - Net Metering, who are already being subsidized by other customers, will help limit the further impact on other customers.
7. EV Adoption by Units of Government		
a.	Do current electric rate designs prevent units of government from adopting EV fleets (e.g., school buses, mass transit) for public use? If so, how?	For MidAmerican, units of government have access to the same electric rates as other customers. To the extent that the unit of governments use time-of-use rates, EV fleet charging can be accomplished at a relatively low cost during off-peak hours.
b.	Should electric rate designs be used to encourage units of government to deploy EV fleets (e.g., school buses, mass transit) for public use? Why or why not?	Current rate design already accomplishes this goal. No incentive should be offered that causes a customer's load profile to deteriorate.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate units of government to deploy EV fleets (e.g., school buses, mass transit) for public use?	Current rate design already accomplishes this goal. No incentive should be offered that causes a customer's load profile to deteriorate.
d.	How do electric rate designs used to incent units of government to deploy EV fleets (e.g., school buses, mass transit) for public use affect the affordability of electric service for other electricity users and the affordability of public transit?	Current rate design helps ensure that subsidization of EV customers does not occur. As noted above, additional incentives may result in costs being shifted to other utility customers.
8. Commercial Charging Station Providers		
a.	Are current electric rate designs a barrier to the deployment of public EV charging by commercial charging station providers? If so, how?	Current rate designs wouldn't necessarily prevent commercial providers from installing EV charging infrastructure. However, to the extent that the commercial provider is subject to time-of-use rates and/or a peak demand charge, offering EV charging to the public will be relatively more costly if a significant percentage of charging occurs during on-peak hours.
b.	Should electric rate designs be used to encourage the deployment of public EV charging by commercial charging station providers? Why or why not?	It may be difficult to use electric rate design to incent commercial providers to install EV charging infrastructure without having an adverse impact on other utility customers. Additions to peak load through weekday, daytime electric vehicle charging will raise total system costs which may not be covered through incentive rates applied to that load.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate the deployment of public EV charging by commercial charging station providers?	See responses above.
d.	How do electric rate designs used to incent the deployment of public EV charging by commercial charging station providers affect the affordability of electricity service for other electricity users?	As discussed above, incentive rates that are directed to on-peak loads can raise the cost of energy for all other customers. In addition, limitations on the availability of EV incentives for customers taking service pursuant to the provisions of 83 Ill. Adm. Code Part 465 - Net Metering, who are already being subsidized by other customers, will help limit the further impact on other customers.
9. Low to Moderate Income Customer EV Adoption and Use		

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	Question	MidAmerican Energy Response
a.	Do current electric rate designs present a barrier to the adoption or use of EV technology by low-to-moderate income citizens? If so, how?	MidAmerican's current base non-summer residential electric rate has a second, lower-priced rate step at 1,000 kWh per month that provides incentive for residential EV charging, during the eight non-summer months. If the low-to-moderate income customer's monthly use is currently well below 1,000 kWh per month, any EV charging would be billed at the higher first rate step during the eight non-summer months, making electric vehicle charging more expensive. However, where feasible, low-to-moderate income customers may elect the optional time-of-use rate for off-peak charging at a lower cost.
b.	Should electric rate designs be used to encourage the use of EV technology by low-to-moderate income citizens? Why or why not?	Yes, electric rate designs should be used to encourage adoption of EVs by all customers. Rate design can be used to improve the system load profile through incentives for off-peak charging.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate the use of EV technology by low-to-moderate income citizens?	If time-of-use rates for all usage at the premises are not economic, utilizing EV chargers that are able to provide time-of-use data could allow for economic rate designs to be applied to only usage from the EV charger.
d.	How do electric rate designs used to incent use of EV technology by low-to-moderate income citizens affect the affordability of electric service for other electricity users?	The impact on other users can be eliminated through proper rate design that highly encourages off-peak usage as well as through administrative charges that cover the cost of targeted programs. In addition, limitations on the availability of EV incentives for customers taking service pursuant to the provisions of 83 Ill. Adm. Code Part 465 - Net Metering, who are already being subsidized by other customers, will help limit the further impact on other customers.
e.	Are there other ways to provide benefits from EVs to low-to-moderate income citizens?	As more modes of public transportation adopt electrification, all citizens will benefit. Also, even if low-to-moderate income citizens do not adopt EVs, they can still benefit if incremental load from EVs improves the electric system's overall load profile, which would spread system fixed costs over a greater volume of throughput.
10. Environmental Impacts of EV Use		
a.	Do current electric rate designs prevent customers from using EVs in a manner that has a positive environmental impact? If so, how?	One way that rate design can help EVs have a positive environmental impact is to encourage off-peak charging when wind generation (e.g.,) is the marginal generation source used to meet demand. As noted above, almost all residential and small commercial customers currently have the option to elect time-of-use rates.
b.	Should electric rate designs be used to encourage customers to use EVs in a manner that has a positive impact on the environment? Why or why not?	Yes, electric rate designs should be used to encourage use of EVs in a manner that has a positive impact on the environment. Just by encouraging adoption of EVs, rate design can have a positive impact on the environment. Also, rate design can be used to encourage better utilization of current system resources.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate customers to use EVs in a manner that has a positive impact on the environment?	See responses above.
d.	How do electric rate designs used to incent customers to use EVs in a manner that has a positive impact on the environment	The impact on other users can be eliminated through proper rate design that highly encourages off-peak usage as well as through administrative charges that cover the cost of targeted programs.

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	affect the affordability of electric service for other electricity users?	
11. EV Use Impacts on Grid Costs		
a.	Do current rate designs incent customers to use EVs in a manner that reduces grid costs (e.g., distribution costs, transmission costs, capacity costs)?	Current time-of-use rates incent customers to use EVs in a manner that minimizes the impact on grid costs. However, many smaller customers do not elect service pursuant to MidAmerican's optional time-of-use rate tariffs, and therefore have no direct incentive to use EVs in a manner that minimizes the impact on grid costs. For Level 1 EV chargers, the interconnection costs to accommodate the EV chargers will be less likely affected by rate design, especially for existing homes and businesses. For Level 2 chargers or clusters of chargers, the design of the EV charger control system to limit the charge level may be needed to reduce grid interconnection costs.
b.	Should electric rate designs be used to incent customers to use EVs in a manner that reduces grid costs? Why or why not?	To minimize the impact on grid costs and avoid subsidization of EV charging, it is necessary to incent customers through rate design to shift EV charging to off-peak periods. It may also be necessary to take into consideration the location of any proposed commercial charging station to ensure that local distribution facilities are adequate to accommodate the incremental load, especially where a significant amount of weekday charging is expected. Rate design alone cannot be relied on to limit grid interconnection costs on installations that could overload existing equipment if customers chose to ignore rate design incentives.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to encourage customers to use EVs in a manner that reduces grid costs?	Time-of-use rates that strongly encourage off-peak EV charging will be critical to minimizing the impact on grid costs. Also, commercial EV stations should be encouraged to locate where distribution facility upgrades would not be necessary, thereby limiting grid interconnection costs and/or excess facilities charges.
d.	How do electric rate designs used to incent customers to use EVs in a manner that reduces grid costs affect the affordability of electric service for other electricity users?	Properly designed time-of-use rate incentives should help ensure that EV charging is not subsidized. There is some potential for EV charging to actually help reduce the revenue requirement of other customers if incremental revenues and other positive impacts exceed the incremental costs to service the EV charging load.
12. EV Use Impacts on Reliability and Resiliency		
a.	Do current electric rate designs prevent customers from using EVs in a manner that has a positive reliability and resiliency impact on the grid? If so, how?	EV customers' response to current rate designs cannot have a positive impact on the reliability and resiliency on the grid; it can only have a negative impact if EV adoption becomes wide-spread and a significant portion of charging occurs during on-peak times and/or is geographically concentrated.
b.	Should electric rate designs be used to encourage customers to use EVs in a manner that has a positive reliability and resiliency impact on the grid? Why or why not?	See response to a. above
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate customers to use EVs in a manner that has a positive reliability and resiliency impact on the grid?	See response to a. above
d.	How do electric rate designs used to incent customers to use EVs in a manner that has a positive reliability and resiliency	See response to a. above

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	impact on the grid affect the affordability of electric service for other electricity users?	
13. EV Rate Design Principles		
a.	Are there examples of rate design principles or rate designs, not addressed above, that would result in EV adoption or use in a manner that would be in the public interest? If so, please explain.	MidAmerican does not currently offer any other form of rate design in its service territories that provides an incentive to EV adoption.
b.	Are there examples of other mechanisms that may be used in conjunction with rate designs (e.g., pairing load management with rate design) that would result in EV adoption or use in a manner that would be in the public interest? If so, please explain.	For residential EV charging, load management may be necessary to avoid creating a secondary peak in the evening. Load management may also be necessary to avoid overloading local circuits if EV adoption becomes concentrated on that circuit.
c.	Please provide examples of rate designs employed in other states or jurisdictions that might serve as best practices with respect to EV adoption or use in Illinois.	MidAmerican does not currently have rate designs in other states or jurisdictions directed at EV adoption. MidAmerican does currently offer a one-time rebate towards the purchase on an EV.
B. Rate Design Impacts on Other Forms of Beneficial Electrification		
1. What types of beneficial electrification other than adoption of EV's should the Commission be examining?		Electrification of the transportation sector presents unique benefits related to the improvement of system load factor. These benefits result from the inherent flexibility of EVs as energy storage devices.
2. Adoption and Use		
a.	Do current electric rate designs present a barrier to the adoption or use of each such other form of beneficial electrification? If so, how?	Current rate designs wouldn't necessarily prevent adoption of other forms of beneficial electrification. However, to the extent that the energy user is subject to time-of-use rates and/or a peak demand charge, beneficial electrification will be relatively more costly for those without the flexibility to limit the amount of on-peak energy use.
b.	Should electric rate designs be used to encourage the use of each such other form of beneficial electrification? Why or why not?	It may be difficult to use electric rate design to incent the adoption of other forms of beneficial electrification without having an adverse impact on other customers. Additions to peak load through weekday, daytime electric use will raise total system costs which may not be covered through incentive rates applied to that load.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate the use of each such other form of beneficial electrification?	See responses above.
d.	How do electric rate designs used to incent each such other form of beneficial electrification affect the affordability of electric service for other electricity users?	As discussed above, incentive rates that are directed to on-peak loads can raise the cost of energy for all other customers.
e.	Are there other ways to provide benefits from each such other form of beneficial electrification?	Rebates can reduce the cost of adoption of electrification.
3. Environmental Impacts of Beneficial Electrification Use		

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a.	Do current electric rate designs prevent customers from using each such other form of beneficial electrification in a manner that has a positive environmental impact? If so, how?	One way that rate design can help other forms of beneficial electrification have a positive environmental impact is to encourage off-peak charging when wind generation is the marginal generation source used to meet demand. As noted above, almost all residential and small commercial customers are not currently subject to time-of-use rates.
b.	Should electric rate designs be used to encourage customers to use each such other form of beneficial electrification in a manner that has a positive impact on the environment? Why or why not?	Yes, electric rate designs should be used to encourage other forms of beneficial electrification to the extent that it does not result in a deterioration of the system's load profile.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate customers to use each such other form of beneficial electrification in a manner that has a positive impact on the environment?	See responses above.
d.	How do electric rate designs used to incent customers to use each such other form of beneficial electrification in a manner that has a positive impact on the environment affect the affordability of electric service for other electricity users?	The impact on other users can be eliminated through proper rate design that highly encourages off-peak usage as well as through administrative charges that cover the cost of targeted programs.
4. Beneficial Electrification Use Impacts on Grid Costs		
a.	Do current rate designs incent customers to use each such other form of beneficial electrification in a manner that reduces grid costs (e.g., distribution costs, transmission costs, capacity costs)?	Current time-of-use rates incent customers to use other forms of beneficial electrification in a manner that minimizes the impact on grid costs. However, many smaller customers are billed on rates that do not differentiate time-of-use, and thereby have no direct incentive to use other forms of beneficial electrification in a manner that minimizes the impact on grid costs.
b.	Should electric rate designs be used to incent customers to use each such other form of beneficial electrification in a manner that reduces grid costs? Why or why not?	To minimize the impact on grid costs and avoid subsidization of incremental load from other forms of beneficial electrification, it is necessary to incent customers through rate design to shift incremental energy use to off-peak periods. It may also be necessary to take into consideration the location of any proposed commercial operation employing other forms of beneficial electrification to ensure that local distribution facilities are adequate to accommodate the incremental load, especially where a significant amount of daytime weekday use is expected.
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to encourage customers to use each such other form of beneficial electrification in a manner that reduces grid costs?	Time-of-use rates that encourage off-peak use will be critical to minimizing the impact on grid costs. Also, commercial facilities designed to employ other forms of beneficial electrification should be encouraged to locate where distribution facility upgrades would not be necessary, thereby avoiding excess facilities charges.
d.	How do electric rate designs used to incent customers to use each such other form of beneficial electrification in a manner that reduces grid costs affect the affordability of electric service for other electricity users?	Properly designed time-of-use rate incentives should help ensure that incremental load from other forms of beneficial electrification is not subsidized. There is some potential for this incremental load to reduce the revenue requirement of other customers if incremental revenues and other positive impacts (e.g., increased wind production tax credits) exceed the incremental costs to serve the incremental load.
5. Beneficial Electrification Use Impacts on Reliability and Resiliency		

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Question		MidAmerican Energy Response
a.	Do current electric rate designs prevent customers from using each such other form of beneficial electrification in a manner that has a positive reliability and resiliency impact on the grid? If so, how?	EV customers' response to current rate designs cannot have a positive impact on the reliability and resiliency on the grid; it can only have a negative impact if EV adoption becomes wide-spread and a significant portion of charging occurs during on-peak times and/or is geographically concentrated.
b.	Should electric rate designs be used to encourage customers to use each such other form of beneficial electrification in a manner that has a positive reliability and resiliency impact on the grid? Why or why not?	See response to a. above
c.	If you are in favor of providing incentives through electric rate design, what specific electric rate designs can be used to motivate customers to use each such other form of beneficial electrification in a manner that has a positive reliability and resiliency impact on the grid?	See response to a. above
d.	How do electric rate designs used to incent customers to use each such other form of beneficial electrification in a manner that has a positive reliability and resiliency impact on the grid affect the affordability of electric service for other electricity users?	See response to a. above
6. Beneficial Electrification Rate Design Principles		
a.	Are there examples of rate design principles or rate designs, not addressed above, that would result in each such other form of beneficial electrification adoption or use in a manner that would be in the public interest? If so, please explain.	MidAmerican has not identified other examples of rate designs that encourage other forms of beneficial electrification.
b.	Are there examples of other mechanisms that may be used in conjunction with rate designs (e.g., pairing load management with rate design) that would result in each such other form of beneficial electrification adoption or use in a manner that would be in the public interest? If so, please explain.	See response to 13.b. above
c.	Please provide examples of rate designs employed in other states or jurisdictions that might serve as best practices with respect to each such other form of beneficial electrification adoption or use in Illinois.	MidAmerican does not currently have rate designs in other states or jurisdictions directed at other forms of beneficial electrification adoption.
C. Rate Design Implementation		
1. Please identify any rate design changes that you would recommend be adopted in Illinois, including the rate design changes addressed above.		In addition to the existing optional time-of-use rate structures for residential and small commercial customers, MidAmerican could explore offering alternative optional time-of-use rate structures designed to provide even greater incentives for off-peak use. Such rate designs could be introduced on a pilot basis, with potential modifications to the existing optional time-of-use rates, including increased time-of-use pricing differentials and/or an off-peak declining block rate structure.

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	Additionally, as mentioned in MidAmerican's response to A.1.c., MidAmerican could explore leveraging time-of-use meter data to augment its current rate structures with off-peak bill credits on a pilot basis.
2. For any rate design change you recommend be adopted, please explain the process required to adopt such rate design change (e.g., requires a change in law, requires a change in Commission rules, requires a tariff change, etc.).	MidAmerican did not advocate any rate design changes in response to C.1. However, the implementation of the potential pilot programs discussed in its response to C.1. could be accomplished through a tariff filing subject to Commission approval.
3. Please identify how your recommended rate design changes may affect low to moderate income citizens.	MidAmerican did not advocate any rate design changes in response to C.1.